

***IN THE DISTRICT COURT OF THE UNITED STATES***

***for the Western District of New York***

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**MARCH 2022 GRAND JURY  
(Impaneled 03/25/2022)**

**THE UNITED STATES OF AMERICA**

**INDICTMENT**

**-vs-**

**Violations:**

**PETER GERACE, JR.**

Title 18, United States Code,  
Sections 1512(b)(1), 1512(b)(2)(A),  
1512(b)(3), and 2;  
Title 21, United States Code, Section  
841(a)(1)  
(4 Counts)

**COUNT 1**

**(Tampering with a Witness)**

**The Grand Jury Charges That:**

On or about November 19, 2019, in the Western District of New York, the defendant, **PETER GERACE, JR.**, and others, did knowingly use intimidation, threaten, and corruptly persuade, and attempt to use intimidation, threaten, and corruptly persuade Witness 1, a person known to the Grand Jury, by sending intimidating, threatening, and harassing Facebook messages to Witness 1 with the intent to influence, delay, and prevent the testimony of Witness 1 in an official proceeding, that is, a federal grand jury investigation and subsequent criminal proceedings involving the defendant, **PETER GERACE, JR.**, in the United States District Court for the Western District of New York.

**All in violation of Title 18, United States Code, Sections 1512(b)(1) and 2.**

**COUNT 2**

**(Tampering with a Witness)**

**The Grand Jury Further Charges That:**

On or about November 19, 2019, in the Western District of New York, the defendant, **PETER GERACE, JR.**, and others, did knowingly use intimidation, threaten, and corruptly persuade, and attempt to use intimidation, threaten, and corruptly persuade Witness 1, a person known to the Grand Jury, by sending intimidating, threatening, and harassing Facebook messages to Witness 1 with the intent to cause and induce Witness 1 to withhold testimony from an official proceeding, that is, a federal grand jury investigation, and subsequent criminal proceedings involving the defendant, **PETER GERACE, JR.**, in the United States District Court for the Western District of New York.

**All in violation of Title 18, United States Code, Sections 1512(b)(2)(A) and 2.**

**COUNT 3**

**(Tampering with a Witness)**

**The Grand Jury Further Charges That:**

On or about November 19, 2019, in the Western District of New York, the defendant, **PETER GERACE, JR.**, and others, did knowingly use intimidation, threaten, and corruptly persuade, and attempt to use intimidation, threaten, and corruptly persuade Witness 1, a person known to the Grand Jury, by sending intimidating, threatening, and harassing Facebook messages to Witness 1 with the intent to hinder, delay, and prevent communication to a law enforcement officer and judge of the United States of information relating to the commission and possible commission of a federal offense.

**All in violation of Title 18, United States Code, Sections 1512(b)(3) and 2.**

**COUNT 4**

**(Distribution of Cocaine)**

**The Grand Jury Further Charges That:**

On or about November 19, 2019, in the Western District of New York, the defendant, **PETER GERACE, JR.**, did knowingly, intentionally, and unlawfully possess with intent to distribute, and distribute, cocaine, a Schedule II controlled substance.

**All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).**

DATED: Buffalo, New York, March 23, 2023.

TRINI E. ROSS  
United States Attorney

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A TRUE BILL:

S/FOREPERSON  
FOREPERSON